

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE**

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In RE: Brian Goodman, Sr. \* Case No.: 25-10233-KB  
                                  \* CHAPTER 13  
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                                  Debtor \*  
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Lawrence P. Sumski, Trustee \*  
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                                  Movant \* Hearing Date: 7/11/2025  
                                  \* Hearing Time: 9:00 A.M.  
                                  \*  
                                  V. \*  
                                  \*  
                                  \*  
Brian Goodman, Sr. \*  
                                  \*  
                                  Respondent \*  
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**DEBTOR'S ANSWER AND OBJECTION  
TO  
TRUSTEE'S MOTION TO DISMISS**

**NOW COMES** the Debtor and Respondent in the above-captioned matter, Brian Goodman, Sr., by and through his/her/their Attorneys, Raymond J. DiLucci, P.A. and Answers and Objects to the Trustee's Motion to Dismiss and in support thereof says:

1. That the Respondent states that he is working on providing the required documents to the Trustee.
2. That the Respondent denies the allegations contained in paragraph 2.
3. That the Respondent admits the allegations contained in paragraph 3.
4. That the Respondent denies the allegations contained in paragraph 4 and states that he intends to amend his plan shortly to correct the amounts as there have been Proofs of Claim filed.
5. That the Respondent denies the allegations contained in paragraph 5 and states that the Amendment has been filed.

**WHEREFORE**, the Respondent Respectfully requests that this Honorable Court;

- A. Deny the Trustee's Motion to Dismiss; and
- B. And for such other and further relief as may be deemed fair, just and equitable.

Respectfully submitted,  
Brian Goodman, Sr.  
By and through his/her/their Attorney

Dated: July 10, 2025

/s/ Kathleen E. McKenzie, Esq.  
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